

The factual information set forth on the Tracking Charts was submitted to the FLA by each Independent External Monitor and Participating Company and reviewed by FLA staff. It is being made available to the public pursuant to the FLA Charter in order to strengthen the monitoring process. The FLA Charter provides for regular public disclosure of the factual results of independent monitoring and the resulting specific actions taken by Participating Companies.

What is a Tracking Chart?

Compliance is a process, not an event. A Tracking Chart outlines the process involved in FLA independent external monitoring and remediation. It is used by the accredited independent external monitor, the participating company and the FLA staff to do the following:

- **Record Findings:** The independent external monitor uses the Tracking Chart to report noncompliance with FLA Code standards. The monitor should also cite the specific Code benchmark or national/local law that was used to measure compliance.
- **Report on Remediation:** The FLA participating company uses the Tracking Chart to report on the remediation program that was implemented in order to resolve the noncompliance and prevent any future violations.
- **Evaluate Progress:** The FLA uses the Tracking Chart for purposes of collecting and analyzing information on the compliance situation of a particular factory and for publication on our website. This information is updated on an ongoing basis.

What a Tracking Chart is NOT -

- An exhaustive assessment of factory conditions

Working conditions - in any type of workplace - are dynamic. Each Tracking Chart represents a survey of the factory's conditions on a specific day. Over time, a fuller picture emerges as we compile information from various sources to track the compliance progress of a factory.

- A pass or fail evaluation

The Tracking Charts do not certify whether or not factories are in compliance with the FLA Code. Monitoring is a measurement tool. The discovery of noncompliance issues is therefore not an indication that the participating company should withdraw from a factory. Instead, the results of monitoring visits are used to prioritize capacity building activities that will lead to sustainable improvements in the factory's working conditions.

- A one-time event

Each monitoring visit is followed by a remediation program, further monitoring and remediation in an ongoing process. The Tracking Charts are updated accordingly.

Note on Language

Please be advised that because FLA independent external monitors are locally-based and English is generally not their native language, the language presented may at times appear unclear to a reader who is a native English speaker. In order to preserve the integrity of the transparency process and the information we receive, our policy is to publish the original text from the monitor and participating company. However, the reader will note that we have taken the precaution to remove any identifying information about the factory that was monitored or the workers interviewed.

For example, in cases where monitors and/or participating companies have cited the actual number of workers in reference to a noncompliance issue, in order to protect the workers' identities, we have replaced the numbers with generic wording in brackets (i.e. "[some]", "[worker interviews revealed that]",etc.).

We do not disclose the name of the factory that was monitored in order to ensure that the FLA's efforts to encourage and reward transparency do not have detrimental consequences for the factory and the workers.

Instructions for Printing

The information contained in the Tracking Charts is organized by columns and rows in a table format. Due to the number and width of the columns, the charts have been formatted for legal size (8.5 x 14in.) paper. To print the charts, please make sure to select "legal" size paper from Print properties.

FLA Audit Profile	
Country	USA
Factory name	17008214D
IEM	ALGI
Date(s) in facility	7/11-7/13/05
PC(s)	Herff-Jones Company
Number of workers	285
Product(s)	Graduation Robes, Graduation Hats, Diploma Frames
Production processes	

			IEM FINDINGS						REMEDIATION					(STATUS)
FLA Code/Compliance issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (Un corroborated)	If Not Corroborated, Explain Why	Sources/Documentation	Notable Features Implemented by Factory Management or Company	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow-up	Documentation	Completed, Pending, On-going
1. Code Awareness														
Code Posting/Information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	FLA Code of Conduct is not posted.				Employer and employee interviews - Employer has not received Code from FLA.				The plant will post the FLA Code when appropriate.			
Worker/Management Awareness of Code		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	Herff-Jones Company Code of Conduct is posted only in English, not in languages spoken by employees. (It should be noted this is due to the multitude of languages and dialects spoken in the factory).				Employer and employee interviews; monitoring team observations.	As per employer and employee interviews, Herff-Jones Company Code of Conduct is posted and employees are informed of code in handbook and through training.				The plant consistently makes use of interpreters and translators to be sure all employees have access to company information.		
Confidential Non-compliance Reporting Channel		FLA Principle of Monitoring, Obligation of Companies: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.						Company has in place a suggestion box for anonymous complaints. As per employee interviews, there are no repercussions for its use, and they feel it is effective.						
2. Forced Labor														
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.														
3. Child Labor														
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.														
4. Harassment or Abuse														
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.														
5. Nondiscrimination														
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.														
6. Health and Safety														
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.														
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Permanent shelving must be secured to the wall or floor.				Observed by monitoring team and employer safety coordinator.				All shelving with a risk of tipping is secured.	Complete		Completed
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Ethernet cable across floor creates a trip hazard.				Observed by monitoring team and employer safety coordinator.				Cable removed.	Complete		Completed
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Accelerate replacement of wooden supports.				Observed by monitoring team and employer safety coordinator.				We have accelerated the replacement schedule for the posts.	On-going		On-going
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Replace loose floor boards.				Observed by monitoring team and employer safety coordinator.				Repaired	Complete		Completed
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Elevator safety gate must be extended to 48" in height.				Observed by monitoring team and employer safety coordinator.				The plant will extend the gate height.	10/31/2006		Completed

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM FINDINGS						REMEDATION					[STATUS]
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/Documentation	Notable Features Implemented by Factory Management or Company	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow-up	Documentation	
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	One staircase needs handrail installed.				Observed by monitoring team and employer safety coordinator.				The plant will install a handrail.	10/31/2006		Completed
Fire Safety, Health and Safety Legal Compliance	29CFR1910	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Forklift trainer needs to be certified.				Observed by monitoring team and employer safety coordinator.				Herff-Jones Company training has been scheduled for October 2006.	10/31/2006		Completed
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Semi-annual fire drills are not conducted.				Employer and employee interviews.				The plant has resumed the practice of holding regular fire drills.	The next drill will be in October 2006.		On-going
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Fire drill logs are not maintained.				Employer and safety coordinator interviews.				Log maintained.	On-going		On-going
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Extension cord laying across floor creates a trip hazard.				Employer and safety coordinator interviews.				Cord removed.	Completed		Completed
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Exit signs need to be suitably illuminated.				Employer and safety coordinator interviews.				New signs are being installed.	On-going		On-going
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Major aisles must be 36" wide and unobstructed.				Employer and safety coordinator interviews.				On-going house keeping to maintain open aisles.	On-going		On-going
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Fire exits must be unobstructed				Employer and safety coordinator interviews.				On-going house keeping to maintain exits.	On-going		On-going
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	One fire exit is not properly sized.				Employer and safety coordinator interviews.				Old exit demolished after the new fire exit was completed in October 2005.	Completed		Completed
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Fire exits must have street access.				Employer and safety coordinator interviews.				Some exits lead into large, open fenced areas. We are looking into adding release mechanisms so auto gates can be opened from inside the gate.	Pending		Pending
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Replace or remove inoperable sliding fire door				Employer and safety coordinator interviews.				Repaired	Completed		Completed
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Safety plan must be instituted.				Employer and safety coordinator interviews.				Improvements to all safety related plans and records are in progress	On-going		Pending
Evacuation Procedure	29CFR1910	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Emergency evacuation plans need to be posted prominent places.				Employer and safety coordinator interviews.				In progress	On-going		Pending
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguishers need monthly visual inspection.				Observed by monitoring team and employer safety coordinator.				The safety committee is performing a monthly inspection and we have a professional check on a yearly basis.	On-going		On-going

FLA Code/Compliance issue	Country Law/Legal Reference	FLA Benchmark	IEM FINDINGS						REMEDATION					[STATUS]
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Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguishers must be unobstructed.				Observed by monitoring team and employer safety coordinator.				On-going house keeping to keep clear.	On-going		On-going
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguishers must be properly mounted.				Observed by monitoring team and employer safety coordinator.				Fire extinguishers checked during inspection.	On-going		On-going
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguishers need yellow demarcation lines in front of them to designate clear zones.				Observed by monitoring team and employer safety coordinator.				The plant has added demarcation lines in other areas where needed and will plan to add to fire extinguisher areas as well.	Pending		Pending
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Stock must have 18" clearance from fire sprinkler heads.				Observed by monitoring team and employer safety coordinator.				Majority of shelves exceed 8". There is one area with 14"-16" clearance where increased height is not possible.			
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Replace expired first-aid supplies.				Observed by monitoring team and employer safety coordinator.				Supplies updated.	Completed		Completed
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Sharps disposable container needed for used needles.				Observed by monitoring team and employer safety coordinator.				Containers have been ordered.	10/15/2006		Completed
Safety Equipment	29CFR1910	All safety and medical equipment (such as fire-fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.					Observed by monitoring team and employer safety coordinator.	Defibrillator is available for use.						
PPE	29CFR1910	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Use of respiratory masks in spray areas need to be enforced.				Observed by monitoring team and employer safety coordinator.				Enforced	On-going		On-going
PPE	29CFR1910	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Cutter was observed not using mandated PPE.				Observed by monitoring team and employer safety coordinator.				New PPE was ordered and proper use is being enforced.	Complete		Completed
PPE	29CFR1910	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Eye protection (goggles) must be used as needed.				Observed by monitoring team and employer safety coordinator.				Enforced	On-going		Completed
PPE	29CFR1910	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Cushioned floor mats should be used for employees whose duties involve standing stationary for extended periods.				Observed by monitoring team and employer safety coordinator.				Replacement of worn mats is planned before those areas are put in use next spring.	3/1/2007		On-going
Chemical Management	29CFR1910	All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	Store insecticides in secure storage area.				Observed by monitoring team and employer safety coordinator.				Done	Complete		Completed
Chemical Management	29CFR1910	All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances	Chemicals to be used in ventilated areas as indicated on MSDS.				Observed by monitoring team and employer safety coordinator.				On-going enforcement	On-going		On-going
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Circuit breaker panel has unsealed openings.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Circuit breaker panels need demarcated 1 square foot clear zone.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed

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Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Circuit breaker panel switches need to be labeled.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Missing electric outlets with live wiring need to be replaced.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Missing light switches with live electric wiring need replacement.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Replace frayed electric wiring.				Observed by monitoring team and employer safety coordinator.				Done	Completed		Completed
Ventilation/Electrical/Facility Maintenance	29CFR1910	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Multi-tap cubes and extension cords in use. Factory use is not permitted by law.				Observed by monitoring team and employer safety coordinator.				Removed	Completed		Completed
Ventilation/Electrical/Facility Maintenance	430 ILCS 75/10	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Annual boiler inspection certification has expired and new inspection is needed.				Observed by monitoring team and employer safety coordinator.				The boilers in the plant have never been out of current inspection status. Observance occurred after the yearly inspection had been completed but before the new certificate was received from the inspection company.	Completed		Completed
Ventilation/Electrical/Facility Maintenance	430 ILCS 75/10	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Annual air compressor inspection certification has expired and new inspection is needed.				Observed by monitoring team and employer safety coordinator.				Air compressor inspection is done at the same time as the boiler every year.	Completed		Completed
Ventilation/Electrical/facility maintenance	430 ILCS 75/10	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Electric hot plate is missing voltage rating information as required by law.				Observed by monitoring team and employer safety coordinator.				Removed	Completed		Completed
Record Maintenance	29CFR1910	All safety and accident reports shall be maintained for at least one year, or longer if required by law.	MSDS sheets must be maintained in areas of use.				Observed by monitoring team and employer safety coordinator.				Updating MSDS sheets is in progress as part of the update of our complete safety plan.	On-going		On-going
Machinery Maintenance	29CFR1910	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	Steam iron hoses must be insulated.				Observed by monitoring team and employer safety coordinator.				In progress	On-going		On-going
Machinery Maintenance	29CFR1910	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	Elevator safety interlock is not operational.				Observed by monitoring team and employer safety coordinator.				Repair planned	10/31/2006		On-going
Machinery Maintenance	29CFR1910	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	Air compressor joint connections must be lint free.				Observed by monitoring team and employer safety coordinator.				Cleaned	Completed		On-going
Machinery Maintenance	29CFR1910	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	Some sewing machines were missing pulley guards.				Observed by monitoring team and employer safety coordinator.				Replacement and maintenance of guards is in progress.	On-going		On-going
Sanitation in Facilities	29CFR1910	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Workers fail to wash soiled food containers, creating vermin infestation hazard.				Observed by monitoring team and employer safety coordinator.				Removed	Completed		Completed
7. Freedom of Association and Collective Bargaining														
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.														
8. Wages and Benefits														
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.														
Payment of Wages	820ILCS115/4	Legally mandated bonuses (e.g. 13th month payments and severance payments will be paid in full and in a timely manner.	Employer requires direct deposit of wages for all full-time employees, in violation of Illinois labor law.				Illinois labor law, employer and employee interviews.				General company policy is to encourage direct deposit, but it is not required.			
9. Hours of Work														

FLA Code/Compliance issue		Country Law/Legal Reference	FLA Benchmark	IEM FINDINGS					REMEDATION					[STATUS]		
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Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.																
Overtime Limitations			Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Some workers exceed 60 hours of work per work week (60 hour standard was used, although monitoring team was aware that in US, requirement is currently 52 hours).					Time records, employer and employee interviews.			Ours is a very seasonal and time-sensitive business and extended hours are necessary during our busy season.				
10. Overtime Compensation																
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.																
Miscellaneous																